

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

UNITED STATES OF AMERICA	§	
	§	
VS.	§	NO. 4:19-CR-00832
	§	
GERALD GOINES	§	

MOTION TO AMEND PRETRIAL RELEASE CONDITIONS

TO THE HONORABLE GEORGE C. HANKS JR., UNITED STATES DISTRICT
JUDGE FOR THE SOUTHERN DISTRICT OF TEXAS, HOUSTON DIVISION:

COMES NOW, GERALD GOINES, Defendant, by and through undersigned
counsel and respectfully moves this Honorable Court to amend the pretrial release
conditions for Mr. Goines and for good cause would show as follows:

I.

Mr. Goines is currently under home confinement and must be in his residence
24 hours a day with exceptions for medical needs and legal matters. Defendant also
has an active GPS monitor used to keep track of his location at all times.

II.

Mr. Goines is requesting to attend church services twice a week at Grace
International 5775 Little York Road, Houston, Texas 77016.

IV.

Assistant United States Attorney Alamdar Shabbir Hamdani is unopposed to the suggested amendments to the proposed amendment to Mr. Goines's pretrial release conditions.

WHEREFORE, PREMISES CONSIDERED, Defendant, respectfully prays that this motion be granted, that the Court amend the conditions as to allow Mr. Goines to attend church.

Respectfully submitted,

/s/ Nicole DeBorde

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Attorney for Defendant,
GERALD GOINES

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CERTIFICATE OF CONFERENCE

On February 28, 2020, Counsel for Defendant conferred with AUSA Alamdar Shabbir Hamdani concerning his position on Defendant's Motion to Amend Pretrial Release Conditions. Mr. Hamdani stated he is unopposed to this motion. Counsel for Defendant also reached out to with Pretrial Services officer Andrew Adame and is waiting for a response.

/s/ Nicole DeBorde
NICOLE DEBORDE

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing Defendant's Motion Amend Pretrial Release Conditions has been delivered to AUSA Alamdar Shabbir Hamdani via email and to Andrew Adame at Andrew_Adame@txsp.uscourts.gov on this the 28th day of February 2020.

/s/ Nicole DeBorde
NICOLE DEBORDE